

From: [Dan Gainer](#)
To: [Luna, Zolymar](#)
Cc: [Michael Miller](#); [Jaime Feliciano](#); [Leshak, Andrea](#)
Subject: RE: Proteco: East Boundary Fence Work Plan: Estimated Acreage, Fence Route and Fence Clearing
Date: Tuesday, December 21, 2021 8:34:02 AM

Hi Zolymar,

Thank you for letting us know the East Boundary Fence Plan has been approved. We will inform EPA of the mobilization and work schedule for the east fence work once it has been determined with the subcontractor.

Best Regards,

Dan Gainer, PG CSM

Project Coordinator

de maximis, inc.

450 Montbrook Lane

Knoxville, TN 37920

Cell: (865) 621-9315

From: Luna, Zolymar <Luna.Zolymar@epa.gov>
Sent: Monday, December 20, 2021 7:39 PM
To: Dan Gainer <dgainer@demaximis.com>
Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>; Leshak, Andrea <leshak.andrea@epa.gov>
Subject: RE: Proteco: East Boundary Fence Work Plan: Estimated Acreage, Fence Route and Fence Clearing

**** WARNING EXTERNAL SENDER ****

Dan,

EPA has not additional questions at this time. Please, proceed with the proposed order of work as described in your letter submitted via email on December 17, 2021. In addition, at your earliest convenience, please submit the proposed work schedule to coordinate accordingly.

Regards,

Zolymar Luna Díaz

Remedial Project Manager

US EPA Region 2

Caribbean Environmental Protection Division

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Guaynabo, PR 00968

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787-977-5844

From: Dan Gainer <dgainer@demaximis.com>
Sent: Monday, December 20, 2021 5:59 PM
To: Luna, Zolymar <Luna.Zolymar@epa.gov>
Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>; Leshak, Andrea <leshak.andrea@epa.gov>

Subject: RE: Proteco: East Boundary Fence Work Plan: Estimated Acreage, Fence Route and Fence Clearing

Hello Zolymar,

Jaime spoke with Right Way today (12/20/21). He confirmed that the path that the machine creates would be between 5-6 wide. The proposed path for the new east boundary fence would be approximately 2,700 feet long by approximately 6 feet wide resulting in 16,200 ft² being cleared or approximately 0.4 acres along the new fence pathway. Right Way also informed Jaime that they will use the west gate area where the livestock corrals are located as their staging area for their equipment and materials. The proposed staging area is already cleared of vegetation so no additional clearing work would be required. The total estimated area to be cleared for the east fence installation work would be approximately 0.4 acres.

The proposed fence pathway is shown as a dashed line on Figure 1 of the East Boundary Fence Work Plan (attached for ease of reference) . The proposed east fence will be installed between point 44 at the northeast corner of the Site and will extend south/southeast to point 76 as shown on Figure 1. We estimate the east fence length to be approximately 2,625 feet as shown on Figure 1.

However, we added a few feet to our estimated fence length used in the pathway clearing estimate above to account for changes in Site topography along the proposed route.

The vegetation clearing areas stated on Figure 1 of the Site Clearing Plan (CP) and Figure 1 of the East Boundary Fence Work Plan are both approximate. The 51.29 acres included on Figure 1 for the CP was based on the HRS Proteco controlled area boundary that enclosed the EC Waste (former Proteco) office to the south and also included all of Waste Unit 14. The acreage of clearing estimated in the CP inadvertently included the EC Waste office area outside of the south Site fence which is approximately two (2) acres. These 2 acres should not have been included in the total acreage stated on Figure 1 in the CP. Figure 1 of the CP, and the estimate of 49.39 acres stated on Figure 1 of the East Boundary Fence Work Plan, do not include the EC Waste office area.

Please let me know if EPA needs any additional information to review and approve the East Boundary Fence Work Plan.

Best Regards,

Dan Gainer, PG CSM

Project Coordinator

de maximis, inc.

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From: Luna, Zolymar <Luna.Zolymar@epa.gov>

Sent: Monday, December 20, 2021 8:13 AM

To: Dan Gainer <dgainer@demaximis.com>

Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>; Leshak, Andrea <leshak.andrea@epa.gov>

Subject: RE: Proteco: Submission of the East Boundary Fence Work Plan

**** WARNING EXTERNAL SENDER ****

Dan,

Good Morning! Thanks for your prompt response. To better assess the approach proposed in the Workplan letter, It would be very helpful to have the proposed path included in Figure 1. We also noticed, that there is a slight reduction in the total area shown in the Figure 1 of the Workplan submitted on December 17, 2021 (49.39 acres) and the Site Clearing Plan (51.29 acres). Please, explain.

Regards,

Zolymar Luna Díaz

Remedial Project Manager

US EPA Region 2

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From: Dan Gainer <dgainer@demaximis.com>

Sent: Friday, December 17, 2021 4:53 PM

To: Luna, Zolymar <Luna.Zolymar@epa.gov>

Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>; Leshak, Andrea <leshak.andrea@epa.gov>

Subject: RE: Proteco: Submission of the East Boundary Fence Work Plan

Hi Zolymar,

Jaime is not available this afternoon to contact Right Way to get the width of the cutting head that we will be using to clear the vegetation. Based on my experience, the cutting heads mounted on the Bobcats are normally about 5 or 6 feet wide. Using the 6-foot cutting head width as an example, the proposed path for the new fence would be approximately 2,700 feet long by approximately 6 feet wide resulting in 16,200 ft² being cleared or approximately 0.4 acres along the new fence pathway. We might need also to clear a small “laydown area” (e.g. 50 feet by 50 feet) to stockpile materials and park the equipment in the evenings. My preliminary estimate is that we would need to clear approximately 0.5 acre in total to install the east fence.

We’ll ask Jaime to contact Right Way on Monday to get a better estimate. Once we get that information, we will send you an update.

Best Regards,
Dan Gainer, PG CSM
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From: Luna, Zolymar <Luna.Zolymar@epa.gov>

Sent: Friday, December 17, 2021 2:29 PM

To: Dan Gainer <dgainer@demaximis.com>

Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>; Leshak, Andrea <leshak.andrea@epa.gov>

Subject: RE: Proteco: Submission of the East Boundary Fence Work Plan

**** WARNING EXTERNAL SENDER ****

Dan,

Good Afternoon. Do you have an estimate of the total area that will need to be mechanically cleared to access the eastern boundary of the Site?

Zolymar Luna Díaz
Remedial Project Manager
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Caribbean Environmental Protection Division
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From: Dan Gainer <dgainer@demaximis.com>

Sent: Friday, December 17, 2021 2:21 PM

To: Luna, Zolymar <Luna.Zolymar@epa.gov>; Leshak, Andrea <leshak.andrea@epa.gov>

Cc: Michael Miller <m2@demaximis.com>; Jaime Feliciano <JFeliciano@Geosyntec.com>

Subject: Proteco: Submission of the East Boundary Fence Work Plan

Hello,

The PROTECO Landfill Generators Parties' Group is submitting for EPA's review and approval a work plan to install a barbed wire fence along the eastern boundary of the Site. Please contact me if you have any questions or need additional information.

Best Regards,
Dan Gainer, PG CSM
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